Judicial Links



Contact Us Print

Help

eFiling

Click here to eFile on Case

Search for Cases by: Select Search Method...

GrantedPublicAccess Logoff JESSICALISS

All Entries

Display Options:

21AB-CC00092 - CHRISTINE WILSON V PARKER-HANNIFIN CORP. (E-CASE)

		arties & CW @[eys	Docket Entries	Charges, Judgments & Sentences	Service Information	Filings Due	Scheduled Hearings & Trials	Civil Judgments	Garnishments/ Execution
--	--	-----------------------------	-------------------	-----------------------------------	------------------------	----------------	--------------------------------	--------------------	----------------------------

Sort Date Entries:

Descending

Click here to Respond to Selected Documents Ascending Document ID - 21-SMCC-274; Served To - PARKER HANNIFIN CORPORATION; Server -; Served Date - 25-MAY-21; Served Time - 09:00:00; Service Type - Sheriff Department; Reason Description -Served Associated Entries: 05/04/2021 - Summons Issued-Circuit Notice of Service 21-SMCC-274; Electronic Filing Certificate of Service. 05/04/2021 Summons Issued-Circuit Document ID: 21-SMCC-274, for PARKER HANNIFIN CORPORATION. Associated Entries: 05/27/2021 - Agent Served 05/03/2021 Filing Info Sheet eFiling Filed By: JOSHUA GRAHAM MILLER Pet Filed in Circuit Ct Petition. Filed By: JOSHUA GRAHAM MILLER On Behalf Of: CHRISTINE WILSON Judge Assigned

Case net Version 5.14.17.7 Return to Top of Page Released 05/13/2021 Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 2 246ABelCt00092

IN THE CIRCUIT COURT OF THE COUNTY OF FRANKLIN STATE OF MISSOURI

CHRISTINE WILSON,)
Plaintiff,)) Case No.
PARKER-HANNIFIN CORP.,)
) JURY TRIAL DEMANDED
SERVE REGISTERED AGENT:)
The Corporation Company)
120 S. Central Ave.)
Clayton, MO 63105)
•)
Defendant.)

PETITION

COMES NOW Plaintiff, CHRISTINE WILSON, by and through undersigned counsel, and for her causes of action against Defendant, hereby states and alleges the following:

JURISDICTION AND VENUE

- 1. This is an action brought to remedy, inter alia, Defendant's violations of Plaintiff's rights pursuant to the Americans with Disabilities Act ("ADA"), the Age Discrimination in Employment Act of 1967 ("ADEA"), and the Missouri Human Rights Act ("MHRA").
- 2. Plaintiff CHRISTINE WILSON is a 60-year-old individual who resided at all relevant times in the County of Franklin, State of Missouri.
- 3. Defendant Parker-Hannifin Corp. (hereinafter "Parker") is a foreign corporation.
- 4. Defendant Parker regularly and systematically conducts and transacts business associated with and in the County of Franklin, State of Missouri.
 - 5. Defendant Parker uses the service of five or more persons for pay.

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 3 of 16 PageID #: 9

6. Defendant Parker is an employer within the meaning of ADEA, ADA, and MHRA.

- 7. Venue is proper within this Court because the unlawful practices complained of herein occurred in the County of Franklin, State of Missouri.
- 8. Plaintiff filed a charge of discrimination and was issued a Notice of Right to Sue by the U.S. Equal Employment Opportunity Commission.
- 9. Over 180 days have passed since Plaintiff filed her Charge of Discrimination and Plaintiff requested a right to sue from the Missouri Commission on Human Rights.

GENERAL ALLEGATIONS

- 10. Plaintiff was born with an unstable upper spine.
- 11. As a result of the condition, Plaintiff has a permanent C1, C2 and C3 fusion in 1996.
 - 12. Plaintiff began working for Parker as a packer/assembler in March 2008.
 - 13. On August 1, 2019, Plaintiff transferred to a different department.
 - 14. The new assignment required much more overhead lifting and work.
 - 15. The overhead lifting was difficult because of her medical condition.
- 16. Plaintiff spoke with her supervisor about her new assignment and the difficulty she was having because of her medical condition.
 - 17. Plaintiff's supervisor requested that she provide a doctor's note with restrictions.
- 18. Plaintiff obtained a doctor's note stating she could perform her job duties with reasonable restrictions.
 - 19. Defendant was capable of offering reasonable restrictions.
 - 20. Defendant was capable of transferring Plaintiff to her old department or to a new

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 4 of 16 PageID #: 10

department.

- 21. Instead of engaging in the interactive process, Plaintiff was placed on unpaid short-term disability.
 - 22. Plaintiff continued to provide Parker return-to-work authorizations.
- 23. Plaintiff was told that Parker's human resources would contact her in November 2019 to see if she could be accommodated.
 - 24. Plaintiff was not contacted in November 2019.
 - 25. Plaintiff filed a Charge of Discrimination in December 2019.
- 26. In early February 2020, Plaintiff was called back to work and transferred to a different department.
- 27. Defendant had the capacity to transfer Plaintiff to a new position at any time during the time she was forced off.
 - 28. Younger non-disabled employees were allowed to transfer positions upon request.

COUNT I

(ADA-Disability Discrimination/Retaliation)

- 29. Plaintiff restates and realleges paragraphs 1-28 of this Complaint as if fully stated herein.
- 30 At all relevant times, Defendant, Parker, was an employer and/or an agent covered by and within the meaning of the ADA.
- 31. Plaintiff's medical condition(s) are a serious medical condition that substantially limits one or more major life activity.
 - Plaintiff's disability placed her as a member of a protected class under the ADA.
 - 33. Plaintiff was qualified to perform the essential functions of the job.

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 5 of 16 PageID #: 11

- 34. Plaintiff's disability was a motivating factor in Defendant, Parker's, wrongful discriminatory treatment described and set forth above including, but not limited to Plaintiff's forced leave.
- 35. Plaintiff's request for accommodation was a motivating factor in Defendant, Parker's, wrongful discriminatory treatment described and set forth above including, but not limited to Plaintiff's forced unpaid leave.
- 36. Defendant, Parker's, actions were intentional with reckless indifference to Plaintiff's rights and sensibilities.
- 37. Defendant, Parker, and its agents, representatives and employees treated Plaintiff differently than similarly situated employees based on unlawful consideration of her disability.
- 38. As a direct and proximate result of Defendant, Parker's, wrongful acts, Plaintiff has sustained injuries and damages. These include, but are not limited to, the following: past wage loss, loss of fringe benefits, shame, humiliation, embarrassment, anxiety, loss of sleep and interference with her enjoyment of life; and emotional distress, all of which will continue into the future.

WHEREFORE, Plaintiff prays that judgment be entered against Defendant, Parker, and that Plaintiff be awarded past, present and future lost wages and benefits; compensatory damages; interest, costs and reasonable attorneys' fees and expert witness fees; any other relief afforded Plaintiff under the ADA, and all other relief deemed just and equitable.

COUNT II

(ADA-Failure to Accommodate)

39. Plaintiff restates and realleges paragraphs 1-38 of this Complaint as if fully

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 6 of 16 PageID #: 12

stated herein.

- 40. Defendant is an entity engaged in an industry affecting commerce.
- 41. Defendant is an entity who has 500 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year.

At all relevant times, Plaintiff was an individual employed by Defendant.

- 42. Plaintiff's medical condition(s) are a serious medical condition that substantially limits one or more major life activity.
 - 43. Plaintiff's disability placed her as a member of a protected class under the ADA.
- 44. Plaintiff was qualified to perform the essential functions of the job with or without a reasonable accommodation.
- 45. Plaintiff requested the reasonable accommodation of a transfer back to her original position or another position based upon her abilities.
 - 46. Defendant was aware of this request.
- 47. Defendant failed to engage in an interactive process to see what duties Plaintiff could perform.
- 48. The above-referenced requests were reasonable accommodations that were possible for Defendant to provide.
- 49. By failing to take prompt and effective remedial action e.g., allowing Plaintiff to transfer back to her original position or another position based upon her abilities, Defendant, in effect, condoned, ratified, and/or authorized the discrimination against Plaintiff.
- 50. Defendant's actions were intentional with reckless indifference to Plaintiff's rights and sensibilities
 - 51. Defendant treated Plaintiff differently than similarly situated employees based on

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 7 of 16 PageID #: 13

unlawful consideration of disability.

52. As a direct and proximate result of Defendant's wrongful acts, Plaintiff has sustained injuries and damages. These include, but are not limited to: past wage loss, loss of fringe benefits, shame, humiliation, embarrassment, anxiety, loss of sleep and interference with her enjoyment of life; and emotional distress, all of which will continue into the future.

WHEREFORE, Plaintiff prays that judgment be entered against Defendant, Parker, and that Plaintiff be awarded past, lost wages and benefits; compensatory damages, interest, costs and reasonable attorneys' fees; any other relief afforded Plaintiff under the ADA, and all other relief deemed just and equitable.

COUNT III

(ADEA)

- 53. Plaintiff restates and realleges paragraphs 1-28 of this Complaint as if fully stated herein.
- 54. At all relevant times, Parker was an employer and/or an agent covered by and within the meaning of the ADEA.
- 55. Plaintiff's age was a motivating factor in Parker's wrongful discriminatory treatment described and set forth above including, but not limited to Plaintiff's forced unpaid leave.
- 56. Defendant Parker's actions were intentional with reckless indifference to Plaintiff's rights and sensibilities.
- 57. Defendant and its agents, representatives and employees treated Plaintiff differently than similarly situated employees based on unlawful consideration of age.
 - 58. As a direct and proximate result of Defendant's wrongful acts, Plaintiff has

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 8 of 16 PageID #: 14

sustained injuries and damages. These include, but are not limited to, the following: past wage loss; loss of fringe benefits; shame, humiliation, embarrassment, anxiety, loss of sleep and interference with her enjoyment of life; and emotional distress, all of which will continue into the future.

WHEREFORE, Plaintiff prays that judgment be entered against Defendant and that Plaintiff be awarded past lost wages and benefits; compensatory damages, interest, costs and reasonable attorneys' fees and expert witness fees; any other relief afforded Plaintiff under the Civil Rights Act and the ADEA, and all other relief deemed just and equitable.

COUNT IV

(Missouri Human Rights Act - Disability Discrimination)

- 59. Plaintiff restates and realleges paragraphs 1 28 of this Petition as if fully stated herein.
- 60. At all relevant times, Defendant was an individual, employer and/or agent covered by and within the meaning of the Missouri Human Rights Act.
- 61. Plaintiff had a physical disability that substantially limited one or more of her major life activities.
- 62. Plaintiff's disability was a contributing factor in Defendant's wrongful discriminatory treatment described and set forth above, including but not limited to her forced unpaid leave.
- 63. Alternatively, Plaintiff's disability was a motivating factor in Defendant's wrongful discriminatory treatment described and set forth above, including but not limited to her forced unpaid leave.
 - 64. Defendant's actions were intentional with reckless indifference to Plaintiff's rights

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 9 of 16 PageID #: 15

and sensibilities.

65. Defendant and its agents, representatives and employees treated Plaintiff differently than similarly situated employees based on unlawful consideration of disability.

66. As a direct and proximate result of Defendant's wrongful acts, Plaintiff has sustained injuries and damages. These include, but are not limited to the following: past wage loss; loss of fringe benefits; loss of career opportunities; shame, humiliation, embarrassment, anxiety, loss of sleep and interference with the enjoyment of life; and emotional distress, all of which will continue into the future.

WHEREFORE, Plaintiff prays that judgment be entered against Defendants and that Plaintiff be awarded past, present and future lost wages and benefits; compensatory damages, interest, costs and reasonable attorneys' fees; any other relief afforded Plaintiff under The Missouri Human Rights Act, and all other relief deemed just and equitable.

COUNT V

(Missouri Human Rights Act – Age)

- 67. Plaintiff restates and realleges paragraphs 1 28 of this Petition as if fully stated herein.
- 68. At all relevant times, Defendant was an individual, employer and/or agent covered by and within the meaning of the Missouri Human Rights Act.
- 69. Plaintiff's age was a contributing factor in Defendant's wrongful discriminatory treatment described and set forth above, including but not limited to her forced unpaid leave.
- 70. Alternatively, Plaintiff's age was a motivating factor in Defendant's wrongful discriminatory treatment described and set forth above, including but not limited to her forced unpaid leave.

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 10 of 16 PageID #: 16

71. Defendant's actions were intentional with reckless indifference to Plaintiff's rights and sensibilities.

- 72. Defendant and its agents, representatives and employees treated Plaintiff differently than similarly situated employees based on unlawful consideration of age.
- 73. As a direct and proximate result of Defendant's wrongful acts, Plaintiff has sustained injuries and damages. These include, but are not limited to the following: past wage loss; loss of fringe benefits; loss of career opportunities; shame, humiliation, embarrassment, anxiety, loss of sleep and interference with the enjoyment of life; and emotional distress, all of which will continue into the future.

WHEREFORE, Plaintiff prays that judgment be entered against Defendants and that Plaintiff be awarded past, present and future lost wages and benefits; compensatory damages, interest, costs and reasonable attorneys' fees; any other relief afforded Plaintiff under The Missouri Human Rights Act, and all other relief deemed just and equitable.

COUNT VI

(Missouri Human Rights Act -Retaliation)

- 74. Plaintiff restates and realleges paragraphs 1-28 and 59-66 of this Petition as if fully stated herein.
- 75. At all relevant times, Defendant was an individual, employer and/or agent covered by and within the meaning of the Missouri Human Rights Act.
- 76. Defendant's wrongful discriminatory treatment described and set forth above, including but not limited to her forced unpaid leave, was in retaliation for requesting a reasonable accommodation and/or for making complaints about discrimination.
 - 77. Plaintiff's requests and/or complaints were a contributing factor in Defendant's

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 11 of 16 PageID #: 17

wrongful discriminatory treatment described and set forth above, including but not limited to her forced unpaid leave.

- 78. Alternatively, Plaintiff's requests and/or complaints were a motivating factor in wrongful discriminatory treatment described and set forth above, including but not limited to her forced unpaid leave.
- 79. Defendant's actions were intentional with reckless indifference to Plaintiff's rights and sensibilities.
- 80. Defendants and its agents, representatives and employees treated Plaintiff differently than similarly situated employees based on unlawful retaliation.
- 81. As a direct and proximate result of Defendants' wrongful acts, Plaintiff has sustained injuries and damages. These include, but are not limited to the following: past wage loss, loss of fringe benefits, shame, humiliation, embarrassment, anxiety, loss of sleep and interference with the enjoyment of life; and emotional distress, all of which will continue into the future.

WHEREFORE, Plaintiff prays that judgment be entered against Defendants and that Plaintiff be awarded past, lost wages and benefits, compensatory damages, interest, costs and reasonable attorneys' fees; any other relief afforded Plaintiff under The Missouri Human Rights Act, and all other relief deemed just and equitable.

CONSTITUTIONAL CHALLENGE TO SB43

To any extent that Plaintiff is required to raise any constitutional challenges to SB43 at this time, Plaintiff, CHRISTINE WILSON, states as follows:

1. On August 28, 2017, SB43 went into effect as a law approved by the Missouri Legislature and signed by the former Missouri Governor.

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 12 of 16 PageID #: 18

- 2. Mo. Const. art. I, section 22(a) states: "that the right of trial by jury as heretofore enjoyed shall remain inviolate." SB43 has, among others, enacted caps on damages, changed the burden of proof, and eliminated causes of action that are common law rights that violates the Missouri Constitution.
- 3. Mo. Const., art. III, sections 21, 23 require that an act must not have changed from its original purpose, have a single subject and that single subject must be clearly expressed in its title. SB43, among others, has more than one subject, fails to conform to the title, fails to keep the public apprised of the general subject matter of the pending law in violation of the Missouri Constitution.
- 4. Mo. Const., art. I, section 10 requires due process of law before depriving a person of life, liberty or property. Laws lacking in reasonable certainty violate due process and are void for vagueness. SB43 fails to provide sufficient notice to the proscribed conduct to either the actor or enforcer who are subject to the statute and fails to prevent arbitrary or uneven application of the law due to, among others, its confusing and sometimes directly contradictory language.
- 5. SB43, among others, has implemented damage caps and eliminated causes of action in violation of the constitution based upon the theories of equal protection and due process.
- 6. The violating provisions of SB43 are essential to the efficacy of SB43 and, therefore, the entire statute should be held unconstitutional.

WHEREFORE, Plaintiff, CHRISTINE WILSON, respectfully requests that this Honorable Court strike SB43 in its entirety and alternatively to strike any portion of SB43 to the extent the Court deems it severable; to grant temporary, preliminary, and permanent injunctive relief preventing the implementation, enforcement, or application of the unconstitutional laws; for attorney's fees, costs and expenses as may be provided by law, and for such other relief that this

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 13 of 16 PageID #: 19

Court deems just.

Respectfully submitted,

THE FURNISS LAW FIRM, LLC

/s/Joshua G. Miller

Ryan M. Furniss (MO #53787) Joshua G. Miller (MO #67496) 7750 Clayton Road, Suite 102 Saint Louis, MO 63117 (314) 899-9101 (314) 627-5891 (fax) rfurniss@furnisslaw.com jmiller@furnisslaw.com

Attorneys for Plaintiff

Case: 4:21-cv-00738-SPM Doc. #: 1-3 Filed: 06/22/21 Page: 14 of 16 PageID #: 20

Case Number: 21AB-CC00092



Judge or Division:

IN THE 20TH JUDICIAL CIRCUIT, FRANKLIN COUNTY, MISSOURI

IILAMKE				
Plaintiff/Petitioner:		Plaintiff's/Petitioner's	s Attorney/Address	
CHRISTINE WILSON		JOSHUA GRAHAM		
		THE FURNISS LAW		
		222 S CENTRAL A\	/E	
		STE 1004		
	VS.	CLAYTON, MO 631	105-3509	
Defendant/Respondent:		Court Address:		
PARKER HANNIFIN COR	RPORATION	401 E. MAIN STREE	=1	
Nature of Suit:		UNION, MO 63084		
CC Employmnt Discrmntn	213.111			(Date File Stamp)
	Su	mmons in Civi	l Case	
The State of Missouri to	: PARKER HANNIFI	N CORPORATION	SERVE REGISTERED AGEN	IT:
	Alias:		The Corporation Company	
206 LANGE DRIVE			120 S. Central Ave.	
WASHINGTON, MO 63090			Clayton, MO 63105	
COURT SEAL OF			nis court and to file your p	
			e a copy of your pleading i	
			s all within 30 days after re	
			ail to file your pleading, ju	dgment by default may
	be taken against y	ou for the relief dem	anded in the petition.	
	May 4, 20	21	Bilo D Mille	/s/pmh d.c.
FRANKLIN COUNTY	Date		Сіегк	
	Further Information:			
	S	heriff's or Server's R	eturn	
Note to serving officer:	Summons should be retu	irned to the court within 3	30 days after the date of issue.	
I certify that I have serve	d the above summons by	: (check one)		
	e summons and a copy of			
leaving a copy of the			g place or usual abode of the de	
45		, a perso	on of the defendant's/responder	it's family over the age of
	nently resides with the de oration) delivering a copy		ony of the complaint to:	
	oration) delivering a copy	(name)	opy of the complaint to.	(title).
				().
Served at				(address)
in	(County/Ci	ty of St. Louis), MO, on _	(date	e) at (time).
	, ,		·	, ,
Printed Name	e of Sheriff or Server		Signature of She	riff or Server
		otary public if not served		
(0.1)	Subscribed and sworn to	o before me on		date).
(Seal)	M			
	My commission expires	 Date	Nota	ry Public
Sheriff's Fees, if applicab	lo.	24.0		,
Summons	\$			
Non Est	\$ \$			
Sheriff's Deputy Salary	Ψ			
Supplemental Surcharge				
	\$ 10.00			
i ivilleage	\$ <u>10.00</u> \$ (miles @ \$	per mile)	
Mileage Total		miles @ \$	_ per mile)	

classes of suits, see Supreme Court Rule 54.



	<i>γιν φ ι</i> γ
Judge or Division:	Case Number: 21AB-CC00092
Plaintiff/Petitioner: CHRISTINE WILSON vs.	Plaintiff's/Petitioner's Attorney/Address JOSHUA GRAHAM MILLER THE FURNISS LAW FIRM LLC 222 S CENTRAL AVE STE 1004 CLAYTON, MO 63105-3509
Defendant/Respondent: PARKER HANNIFIN CORPORATION	Court Address: 401 E. MAIN STREET UNION, MO 63084
Nature of Suit:	(Date File Stamp)

	(Date File Stamp)
. 0: 11 0	

C Employmnt Discrmntn 2	13.111	(Date File Stamp)
	Summons in Civi	
The State of Missouri to:	PARKER HANNIFIN CORPORATION Alias: 20	SER E REGISTERED AGENT: The Corporation Company 120 Central Ave.
206 LANGE DRIV 63090	÷ 1,001	Clay(:in, MO 63105
COURT SEAL OF	copy of which is attached, and to serve plaintiff/petitioner at the above address exclusive of the day of service. If you be taken against you for the relief der	this could and to file your pleading to the petition, a live a copy of your pleading upon the attorney for ss all within 30 days after receiving this summons, fail to file your pleading, judgment by default may manded in the petition.
FRANKLIN COUNTY	May 4, 2021	1/10 W. Mark -010
	Further Information:	THE TOTAL PROPERTY OF THE PROP
I certify that I have served delivering a copy of the leaving a copy of the s	nently resides with the defendant/respondent. ration delivering a copy of the summons and a(name)	rendant/respondent. ring place or usual abode of the defendant/respondent with son of the defendant's/respondent's family over the age of a copy of the complaint to: INTAKE SPECIALIST (title). (address) MAY 2 5 2021 (date) at 9 ARS (time).
Sheriff's Fees, if applicab Summons	s	
Non Est	\$	
Sheriff's Deputy Salary Supplemental Surcharge	\$10.00	
Mileage	\$ (miles @ \$	per mile)
Total A convolute summons ar	\$ad a copy of the petition must be served on eac	h defendant/respondent. For methods of service on all
clesses of suits, see Supre	ame Court Rule 54	
~ 1 .	21-5MC1	C-4408

SEA (66-18) SM80 (SMCC) For Court Use Only: Document Id # 21-SMCC-274

Civil Procedure Form No. 1; Rules 54.01 - 54.05, 54.13, and 54.20; 506.120 - 506.140, and 506.150 RSMo



	γιν φιν
Judge or Division:	Case Number: 21AB-CC00092
Plaintiff/Petitioner: CHRISTINE WILSON vs.	
Defendant/Respondent: PARKER HANNIFIN CORPORATION	Court Address: 401 E. MAIN STREET UNION, MO 63084
Nature of Suit:	(Date File Stamp)

Summons in Civil Case The State of it issourit to: PARKER HANNIFIN CORPORATION Alias: 20 LANGE DRIV WASHINGTON, M. 1 53090 COURT SEL JF You are summoned to appear before this cou. and to file your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition. May 4, 2021 Date Further Information: Sherriff's or Server's Return Note to serving officer: Summons should be returned to the court within 30 days after the date of issue. delivering a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent. delivering a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/sepondent. to service on a comporation delivering a copy of the petition at the dwelling place or usual abode of the defendant/sepondent. to service on a comporation delivering a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/sepondent. to service on a comporation delivering a copy of the summons and a copy of the complaint to: (name) The Corporation Corporation delivering a copy of the summons and a copy of the complaint to: (name) Sherriff's Fees, if applicable Summons Subscribed and swom to before me on	Nature of Suit:	13 111	,		(Date File Stamp)
The State of N issouri to: 206 LANGE DRIV WASHINGTON, M. 183990 COURT SEA. JF You are summoned to appear before this cou. and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading, judgment by default may be taken against you for the relief demanded in the petition. May 4, 2021 Date FRANKLIN COUNTY Note to serving officer: Summons should be returned to the court within 30 days after receiving this summons, ledivering a copy of the summons and a copy of the petition to the defendant/respondent. delivering a copy of the summons and a copy of the petition to the defendant/respondent. delivering a copy of the summons and a copy of the summons and a copy of the defendant/respondent. (for service on a copy accorption/delivering a copy of the summons and a copy of the defendant/respondent. (for service on a copy of the summons and a copy of the defendant/respondent. (for service on a copy of the summons and a copy of the defendant/respondent. (for service on a copy of the summons and a copy of the complaint to: (seal)	CC Employmint Discrimitin 2	Sui	mmons in Civi	l Case	
You are summoned to appear before this count and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plantiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition. May 4, 2021 Date Date	206 LANGE DRIV	PARKER HANNIFIN Alias: 20		SER E REGISTERED AGEN The Corporation Company 120 Central Ave.	NT:
copy of which is attached, and to serve a copy of your pleating with the control plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition. May 4, 2021 Date		, (M)	d to enmost before t	ble coult and to file vour ¤	leading to the petition, a
Sheriff's or Server's Return		copy of which is a plaintiff/petitioner exclusive of the da be taken against y	ttached, and to serv at the above addres ay of service. If you ou for the relief den	e a copy of your pleading is all within 30 days after r fail to file your pleading, ju nanded in the petition.	eceiving this summons, adgment by default may
Note to serving officer: Summons should be returned to the court within 30 days after the date of issue. certify that I have served the above summons by: (check one) delivering a copy of the summons and a copy of the petition to the defendant/respondent. leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with a person of the defendant/s/respondent starilly over the age of 15 years who permanently resides with the defendant/respondent. (tor service on a comporation delivering a copy of the summons and a copy of the complaint to:	FRANKLIN COUNTY				<u> </u>
Note to serving officer: Summons should be returned to the court within 30 days after the date of issue. certify that I have served the above summons by: (check one) delivering a copy of the summons and a copy of the petition to the defendant/respondent. leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with a person of the defendant/s/respondent starilly over the age of 15 years who permanently resides with the defendant/respondent. (tor service on a comporation delivering a copy of the summons and a copy of the complaint to:		Further Information:			
Served at	l certify that I have served delivering a copy of the leaving a copy of the s 15 years who perman for service on a como	Summons should be retu the above summons by summons and a copy of ummons and a copy of the	urned to the court within c (check one) of the petition to the defithe petition at the dwelli , a pers	30 days after the date of issue endant/respondent. In place or usual abode of the control of the defendant's/responders.	defendant/respondent with ent's tamily over the age of
in St. Louis County (County/City of St. Louis), MO, on MAY Synators (date) at the string. Signators (Sherriff or Server Must be sworn before a notary public if not served by an authorized officer Subscribed and sworn to before me on	Sonved at THE CORPO	RATION CO.			(address)
Sheriff's Fees, if applicable Summons Non Est Sheriff's Deputy Salary Supplemental Surcharge Mileage Total Second of the petition must be served on each defendant/respondent. For methods of service on all	in St. Louis Co.	(County/C	notary public if not serve to before me ons:	Signature of Signa	heriff or Server _ (date).
Summons \$ Non Est \$ Sheriff's Deputy Salary Supplemental Surcharge \$(miles @ \$ per mile) Mileage \$(miles @ \$ per mile) Total \$(must be served on each defendant/respondent. For methods of service on all			Date		
	Summons Non Est Sheriff's Deputy Salary Supplemental Surcharge Mileage Total	\$\$ \$\$ \$d a copy of the petition			ethods of service on all

Civil Procedure Form No. 1; Rules 54.01 - 54.05, 6 SM80 (SMCC) For Court Use Only: Document Id # 21-SMCC-274 54.13, and 54.20; 506.120 – 506.140, and 506.150 RSMo